

IN THE UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

MID-ATLANTIC RESTAURANT GROUP	:	
LLC d/b/a KELLY’S TAP ROOM	:	
	:	
Petitioner,	:	
v.	:	No. 17-1054
	:	
NATIONAL LABOR RELATIONS BOARD,	:	
	:	
Respondent,	:	

**ANSWER TO CROSS-APPLICATION FOR ENFORCEMENT OF AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD**

Mid-Atlantic Restaurant Group, LLC, d/b/a Kelly’s Tap Room (“Mid-Atlantic”), submits this Answer to the Cross-Application for Enforcement by the NLRB. Mid-Atlantic has Petitioned this Court for Review of the same Order at Case No. 16-4300. Mid-Atlantic, for the reasons that will be fully explained in its materials in support of its Petition for Review, submits that this Honorable Court should deny the NLRB’s Application for Enforcement and reverse the Order of the NLRB. Mid-Atlantic admits that jurisdiction and venue are proper in this Court for both this action and its Petition for Review.

Dated: January 31, 2017

Respectfully Submitted,

/s/ Kent E. Conway
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was submitted and will be served upon counsel of record via The Third Circuit E-Filing System.

Dated: January 31, 2017

Respectfully Submitted,

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